

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION AT CINCINNATI**

UNITED STATES OF AMERICA,	:	Case No. CR-1-02-100-1
Plaintiff,	:	Judge Rice
vs.	:	<u>MOTION FOR EXCESS</u>
		<u>COMPENSATION</u>
JOVANNI MANGOTTI,	:	
Defendant.	:	

Comes now Kevin J. Spiering, attorney for defendant Mr. Giovanni Mangotti, and hereby moves the Court for excess compensation. As the records show, counsel was appointed on January 7, 2004. Counsel expended a considerable and exhaustive amount of time reviewing all of the evidence in this case, which involves 75 separate counts of identity fraud and tax fraud. Simply put, this case was a “paper case.” Counsel also consulted with a computer data forensic analyst in preparation for trial. However, a favorable plea bargain was reached, and during the sentence phase two expert witnesses testified about the defendant’s psychological well-being. Through the course of representation, counsel required 26 jail interviews which were out of town. Counsel’s representation of the defendant lasted 31 months.

Counsel submits he is making this request in good faith and a supplemental information statement for excess compensation (CJA 26) has been prepared. Counsel respectfully requests this motion to be granted.

Respectfully submitted,

/s/ Kevin J. Spiering

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Trial Counsel for Defendant Giovanni Mangotti

CERTIFICATE OF SERVICE

A copy of the foregoing was not served electronically to the office of the United States Attorney on this 8th day of August 2006.

/s/ Kevin J. Spiering